

---

ARNOLD & PORTER LLP

---

Kent A. Yalowitz

Kent.Yalowitz@aporter.com  
+1 212.715.1113  
+1 212.715.1399 Fax  
399 Park Avenue  
New York, NY 10022-4690

December 1, 2014

**VIA ECF AND HAND DELIVERY**

Hon. George B. Daniels  
United States District Judge  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*  
Docket No. 04-CV-397 (GBD)(RLE)

Dear Judge Daniels:

Plaintiffs respectfully request that the Court order defendants to provide, by December 5, any proposed corrections to the translations, organization or “completeness” of plaintiffs’ trial exhibits, and that defendants be precluded from objecting to the translation, organization or “completeness” of any exhibits for which they do not propose specific corrections by that date.

Plaintiffs provided defendants with copies of their trial exhibits with certified translations almost nine months ago—on March 7, 2014.

Defendants’ blunderbuss objections to plaintiffs’ proposed trial exhibits include hundreds of unexplained objections to the translation, organization and “completeness” of the exhibits. Plaintiffs have on multiple occasions asked defendants to meet and confer about these objections. At one point, defendants agreed to meet and confer about these objections but then reneged on their agreement.

Defendants’ refusal to discuss their objections with plaintiffs—much less particularize those objections or propose corrections—despite having the exhibits for nine months, is a blatant attempt to sandbag plaintiffs by holding these objections until trial. Plaintiffs will not have their document translators in the courtroom during trial, nor will the parties be able to quickly resolve any objections relating to the completeness and order of exhibits. If these matters are not addressed now, they will lead to delay and inefficiency at trial, as defendants well know.

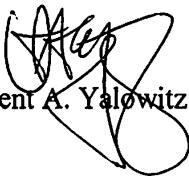
It is unfortunate that the Court must address matters that parties usually can resolve on their own, but defendants’ refusal to engage has left plaintiffs no meaningful choice but to request the Court’s help.

---

ARNOLD & PORTER LLP

Hon. George B. Daniels  
December 1, 2014  
Page 2

Respectfully,



Kent A. Yalowitz

cc: All ECF Counsel